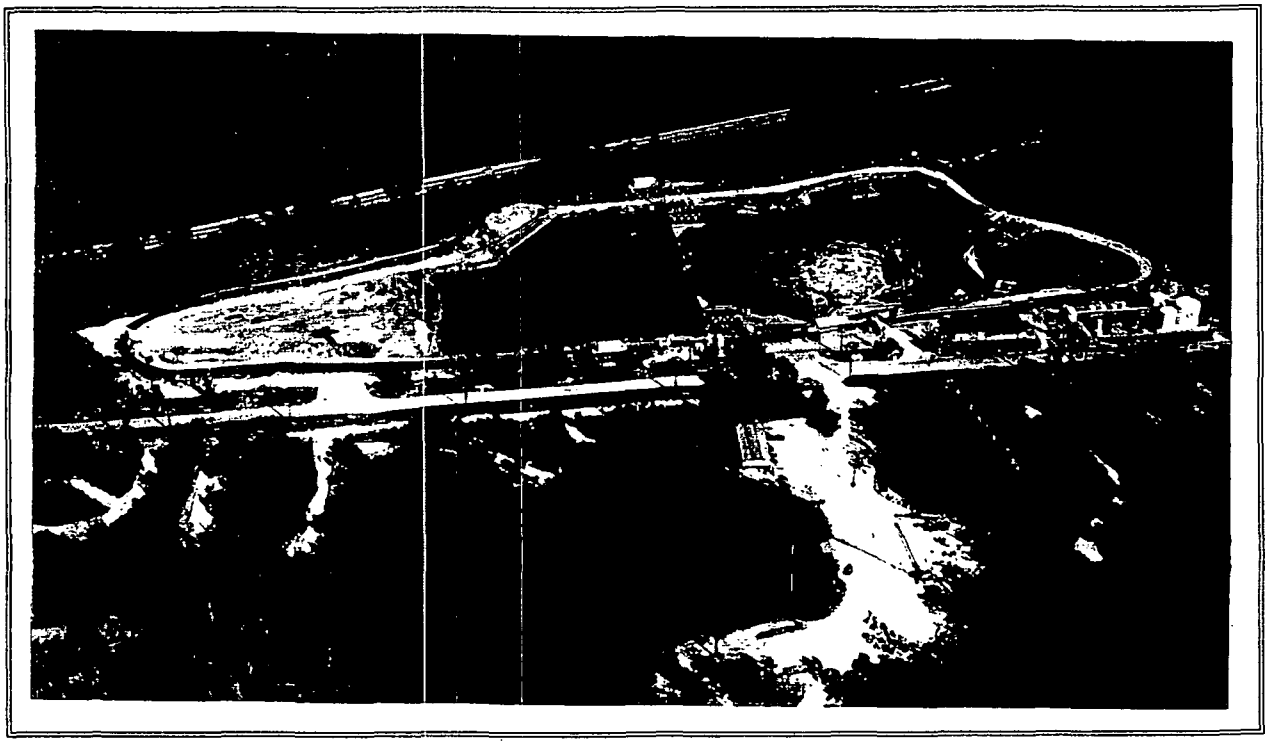
French Ltd. Project

FLTG, Inc.
Crosby, Texas

MONTHLY PROGRESS REPORT



Submitted to:

U.S. Environmental Protection Agency - Region 6
and
Texas Natural Resource Conservation Commission

January, 1996

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1.0 INTRODUCTION

This report covers the activities of FLTG, Inc. and the French Limited Project for January, 1996. FLTG, Inc. manages the project for the French Limited Task Group of Potentially Responsible Parties.

During January, 1996, the project team focused on the following activities and issues:

- Health, Safety, and Quality.
- Safety awareness.
- Safety on dismantling/salvage jobs.
- HAZOP of daily work assignments.
- Detecting and correcting work place hazards.
- Treatment of Cell D water.
- Site closure report.
- Operation of the data base management system.
- Dismantling and salvage of shut-down systems.
- Wetlands project maintenance.
    - This report includes:
    - A summary of January activities, issues, and progress.
    - Lagoon activities.

- Groundwater and Subsoil Remediation activities, issues, and progress.
- Site closure and dismantling activities.
- Groundwater Treatment Plant activities and issues.
- Ambient Air Management.
- QA/QC status and data.
- Site management activities and issues.
- Wetlands maintenance.

2.0 SUMMARY

2.1 Summary of Activities and Progress

2.1.1 Health and Safety

Emphasized the safety issues associated with multiple job assignments, limited support personnel, and dismantling systems; emphasized the need to be flexible and responsive to personal limitations and to changing job conditions; reviewed potential distractions and the impact on safety awareness.

No personal injury or equipment damage incidents.

All site workers earned the January safety bonus.

Conducted safety meetings and job inspections at the start of each shift; reviewed safety issues before starting all jobs.

All employees and contractors attended daily safety meetings.

Conducted daily mini-HAZOP of all specific jobs.

Reviewed the specific hazards and issues associated with dismantling work.

Supervision made 135 specific on-the-job safety contacts.

Emphasized the need to respond to changing weather.

Inspected and certified all fire extinguishers.

Emphasized the hazards and precautions associated with working around moving equipment.

The time-integrated ambient air results indicate no excess human risk (Table 2-1).

Conducted 22 specific health and safety inspections.

Logged all safety issues each shift; less than 24-hour response to all safety issues.

The daily raffle ticket safety awareness program has been effective in maintaining daily safety awareness among all site personnel and contractors.

2.1.2 Quality/QAQC/Data Base Management

The total quality process was used. The status of the goals is shown on Table 2-2.

The quality goals were revised to reflect the site closure activities.

All quality goals were met.

Raw data is being validated as per the plan.

The data base management system operated with no problems or delays.

There were no data or reports rejected due to errors.

2.1.3 Lagoon

Dewatered Cell D by treating the water through the carbon absorption units.

Started preparation for floodwall removal.

Tested floodwall gate closure.

2.1.4 Ambient Air Management

Ambient air quality was manually checked daily with portable TVOC analyzers, and no response action was required.

Air quality was continuously monitored in all potential exposure areas and on all special jobs.

Time-integrated samples were collected in three work areas; the samples were sent to Keystone.

2.1.5 Aquifer Remediation

Secured progress monitoring wells.

Completed quarterly progress well measurements and sampling.

2.1.6 Water Treatment

The water treatment plant was shut down on December 15, 1995; The carbon filters were maintained on-line to treat Cell D water.

The water treatment plant effluent data is shown in Table 2-3. All effluent samples met criteria.

Treated Cell D water as required to keep the volume of water n Cell D at a minimum.

2.1.7 Site Closure and Dismantling

Dismantled all pumping and injection wells. Removed all piping and conduit from the floodwall. Consolidated all electrical service in MCC-3.

2.1.8 Wetlands Restoration

Inspected site twice per week to evaluate vegetation growth and maintenance requirements.

The project construction report in 80% complete.

2.1.9 Site Management and Issues

Reviewed site progress and issues in detail with EPA and TNRCC on a regular basis.

Validated all analytical data as per the QAQC plan.

Reviewed project status and issues each day to ensure focus on critical issues - safety, quality, cost, and site closure.

Reviewed progress on issues and action plans each week.

Continued agency oversight cost discussions with EPA.

Responded to site closure plan comments.

Continued dismantling and salvage of shut-down equipment.

TABLE 2-1

Ambient Air Management
Time Integrated Exposure Data

Compound	PEL 8 hour PPM	1 17-Jan-96 Edward O. % of PEL	1 17-Jan-96 Edward O. PPM	2 17-Jan-96 Chris A. % of PEL	2 17-Jan-96 Chris A. PPM	3 17-Jan-96 Steve R. % of PEL	3 17-Jan-96 Steve R. PPM
Chloromethane	50	0.000	0.000	0.000	0.000	0.000	0.000
Bromomethane	5	0.000	0.000	0.000	0.000	0.000	0.000
Vinyl chloride	1	0.000	0.000	0.000	0.000	0.000	0.000
Chloroethane	1000	0.000	0.000	0.000	0.000	0.000	0.000
Dichloromethane	50	0.000	0.000	0.005	0.003	0.000	0.000
Acetone	750	0.001	0.005	0.001	0.007	0.001	0.007
Carbon disulfide	10	0.000	0.000	0.000	0.000	0.000	0.000
1,1-Dichloroethene	5	0.000	0.000	0.000	0.000	0.000	0.000
1,1-Dichloroethane	100	0.000	0.000	0.000	0.000	0.000	0.000
trans-1,2-Dichloroethe	200	0.000	0.000	0.000	0.000	0.000	0.000
Chloroform	10	0.000	0.000	0.025	0.003	0.000	0.000
1,2-Dichloroethane	10	0.000	0.000	0.011	0.001	0.000	0.000
2-Butanone	200	0.000	0.000	0.000	0.000	0.002	0.004
1,1,1-Trichloroethane	350	0.000	0.000	0.000	0.000	0.000	0.000
Carbon Tetrachloride	5	0.000	0.000	0.015	0.001	0.000	0.000
Vinyl acetate	10	0.000	0.000	0.000	0.000	0.000	0.000
Bromodichloromethane			0.000		0.000		0.000
1,2-Dichloropropane	75	0.000	0.000	0.000	0.000	0.000	0.000
cis-1,3-Dichloropropen	1	0.000	0.000	0.000	0.000	0.000	0.000
Trichloroethene	50	0.000	0.000	0.004	0.002	0.000	0.000
Dibromochloromethane			0.000		0.000		0.000
1,1,2-Trichloroethane	10	0.000	0.000	0.000	0.000	0.000	0.000
Benzene	1	0.000	0.000	0.000	0.000	0.244	0.002
trans-1,3-Dichloroprop	1	0.000	0.000	0.000	0.000	0.000	0.000
2-Chloroethylvinyl ether			0.000		0.000		0.000
Bromoform	0.5	0.000	0.000	0.000	0.000	0.000	0.000
4-Methyl-2-pentanone	50	0.000	0.000	0.000	0.000	0.000	0.000
2-Hexanone	5	0.000	0.000	0.000	0.000	0.000	0.000
Tetrachloroethene	50	0.000	0.000	0.033	0.017	0.001	0.001
1,1,2,2-Tetrachloroet	1	0.000	0.000	0.000	0.000	0.000	0.000
Toluene	100	0.000	0.000	0.000	0.000	0.002	0.002
Chlorobenzene	10	0.000	0.000	0.000	0.000	0.000	0.000
Ethylbenzene	100	0.000	0.000	0.000	0.000	0.000	0.000
Styrene	50	0.000	0.000	0.000	0.000	0.000	0.000
Xylene (total)	100	0.000	0.000	0.000	0.000	0.000	0.000
Hexane			0.000		0.000		0.000

TABLE 2-2

Project Quality

Status as of 01/31/96		Goals	
Yes	1)	No OSHA recordable injuries.	
Attention	2)	100% compliance with all safety rules and procedures.	
Yes	3)	No citations for violations of applicable, relevant and appropriate regulations.	
Yes	4)	100% attendance (including contractors) at daily safety meetings.	
Attention	5)	Less than 24-hour response time on health and safety issues.	
Yes	6)	100% sign-in and security clearance.	
Yes	7)	No invalidation of reported data due to QA/QC issues.	
	8)	Spend less than:	MH/Month
Yes	•	Direct hire	1,200
Yes	•	FLTG management	400
Yes/Attention	•	Technical support	100
Yes/Attention	•	Maintenance support	80
Yes	9)	Hold analytical cost to less than $12,000 per quarter (1996 only).	
Yes	10)	No unscheduled overtime (per day or per week).	
Yes	11)	No agency contacts which require 3rd party resolution.	
Yes	12)	Documented training of site personnel for all work assignments.	
Yes	13)	Monthly audit of actual performance versus goals and closure plan..	

2.2 Problem Areas and Recommended Solutions

Problem	Solution
Maintain high level of safety awareness.	Daily raffle ticket program. Daily safety meetings. Safety meeting participation. Training. Regular HAZOP's. Regular on-the-job contacts. Constant hazard awareness.
On-the-Job safety attention.	Review job details as work proceeds. Stop and challenge approach. Constant emphasis and reminders. Frequent supervisory contact.
Hazard detection and response.	Safety inspections. HAZOP's on all jobs. Constant awareness and follow-up. Sensitive to changing conditions.
EPA oversite costs.	Negotiate lump sum payment.
Long-term site management.	Refine long-term site management plan.

2.3 Problems Resolved

None.

2.4 Deliverables Submitted

December, 1995 monthly report
Revised Site Closure Plan

2.5 Upcoming/Ongoing Events and Activities

Daily safety meetings and inspections.

Daily safety awareness program.

Emphasis on the safety aspect of multiple work assignments.

Emphasis on hazard identification and response.

Attention to safety details during dismantling and disposal.

Operate Data Base Management System.

Total Quality process.

Treat Cell D water with carbon absorption unit.

Implement site closure plan.

Implement long-term site management plan.

Dismantle and salvage remediation systems.

2.6 Key Staffing Changes

None.

2.7 Percent Complete

Research & Development	- 99%
Facilities	-100%
Slough	-100%
Subsoil Investigation	-100%
Floodwall	-100%
Lagoon Remediation	-100%
Groundwater	- 97%
Lagoon Dewatering/Fixation	- 96%
Water Treatment	- 97%
Wetlands	- 98%
Demobilization	- 85%
Monitoring	- 75%

2.8 Schedule

All deliverables are on schedule.

Complete site closure by July 1, 1996.

2.9 Operations and Monitoring Data

The monitoring data, generated during January, 1996, are submitted as parts of this report, and the supporting data are stored in secure storage at the French project office.

2.10 Credits Accrued/Applied

Status of Credits

	Accrued this period	Accrued to date	Applied this period	Applied to date	Running total
December 1990	34	34	0	0	34
December 1991	0	100	0	0	100
December 1992	0	101	0	2	99
December 1993	0	104	0	4	100
December 1994	0	109	0	4	105
January 1995	0	109	0	4	105
February 1995	0	109	0	4	105
March 1995	0	109	0	4	105
April 1995	0	109	0	4	105
May 1995	0	109	0	4	105
June 1995	0	109	0	4	105
July 1995	0	109	0	4	105
August 1995	2	111	0	4	107
September 1995	1	112	0	4	108
October 1995	0	112	0	4	108
November 1995	0	112	0	4	108
December 1995	0	112	0	4	108
January 1996	0	112	0	4	108

2.11 Community Relations

Maintained 24-hour, call-in Hot Line.

Conducted three tours for interested parties.

Supported Barrett Chamber of Commerce development project.

3.0 LAGOON

3.1 Summary of Activities

Treated 96,000 gallons of Cell D water.

Evaluating various options for gradient control inside the lagoon.

Evaluating several surface water source options for the area inside the migration wall.

Awarded contract for wall removal.

Started excavation for wall removal.

Continued dismantling and disposal of scrap piping.

3.2 Problems and Response Action

Problem	Recommended Solution
Ground cover growth slow in Cell E.	Water frequently. Evaluate different grass blends and soil nutrients.
Poor tree growth in Cell E.	Evaluate different types of trees. Relocate trees to perimeter road.

3.3 Problems Resolved

None.

3.4 Deliverables Submitted

None.

3.5 Upcoming Events and Activities

Treat Cell D water through carbon absorption units.

Backfill Cell D with clean soil.

Water Cell E and Cell F as required, using the east slough surface water.

Maintain vegetation in Cell E.

Maintain cottonwood trees along the perimeter road for gradient control.

Dismantle and dispose of surplus pipe in Cell D.

4.0 GROUNDWATER AND SUBSOIL REMEDIATION

4.1 Summary of Activities

Secured progress and compliance monitoring wells.

Purged, measured, and sampled the progress monitoring wells.

Progress and response are consistent with plan.

No problems or issues requiring response action.

4.2 Pending Issues

Intrinsic bioremediation progress.

Quarterly monitoring results.

4.3 Operational Refinements

None.

4.4 Data Summary and Discussion

Water levels were consistent with 30 days after shut-down.

Compliance well field results are consistent with remediation trends.

4.5 Schedule

Quarterly natural attenuation progress report in February, 1996.

5.0 SITE CLOSURE AND DISMANTLING

5.1 Summary of Activities

De-activated the water treatment plant, except the carbon absorption columns.

The plastic media was flushed, removed from the bioreactors, and disposed in Cell D.

All production piping was flushed, dismantled and disposed in Cell D.

All the water and nutrient piping was flushed, tested, dismantled, and stored for sale.

The well pumps were salvaged, decontaminated, and stored for sale or re-use on other projects.

De-activated and salvaged all unused electrical circuits and switchgear.

Plugged and abandoned 27 wells; completed the TNRCC reports to certify abandonment of the wells.

Evaluated peristaltic pump sampling of the progress monitoring wells.

Consolidated all electrical service in one motor control center (MCC-3).

Removed the pipelines from under Gulf Pump Road and sealed the utility channel under the road..

Audited closure activities and progress versus the plan; there were no major variances.

5.2 Problems and Response Actions

Problem	Response Action
Handling media from bioreactors.	Used confined space entry procedure; removed panel from side of tank; level C PPE to prevent excess exposure.
Electrical service to maintenance shop.	Run safe, temporary line from MCC-3 to shop.
Compressed air supply for dismantling.	Purchased two small air compressors for local service.
Access for wall removal contractor.	Cleared wall by west gate; started wall excavation in the same area.
Handling 8" diameter HDPE piping.	Completed detailed HAZOP; relocated using a fork-truck; use two people to move; use caution crossing Gulf Pump Rd.
Possible chemical exposure when excavate for floodwall removal.	Continuously monitor with OVM; ventilate any suspect areas; backfill with "clean" soil if necessary.

5.3 Problems Resolved

Problem	Solution
Compressed air supply.	Purchased two small portable units.
Tripping hazards.	Continuously inspect and pick up work areas.
Shortage of excavation equipment.	Leased a second endloader/backhoe.
Disposal of well purge water.	Convert to peristaltic pump sampling.

5.4 On-going Activities

Excavate and dismantle the floodwall.

Dismantle and dispose/save all piping and conduit.

Plug and abandon all wells not required for long-term site management.

Document well plugging and abandonment.

Daily safety meetings and constant safety awareness.

Include electrical contractor and wall dismantling contractor on daily safety incentive.

Dismantle and salvage electrical controls, switches, wiring, and motors.

Issue final site closure plan.

6.0 AMBIENT AIR MANAGEMENT

Ambient air quality management continued on an "as-needed" basis to protect the environment, human health, and site workers.

6.1 Summary of Activities

Collected and analyzed three ambient air samples; sent January samples to Keystone; the results indicated no excess exposure to organic chemicals.

Sampled the ambient air in all work areas several times per shift and on a random "spot-check" basis; there were no levels of volatile organic compounds which required response action. Sampled ambient air in special work areas where burning and/or welding was planned. Sampled ambient air continuously in areas where exposure could occur and where confined space work occurred.

6.2 Problems and Response Action

Problem	Response Action
Calibrate portable vapor meters.	Calibrate before each use.
Sampling "hot" wells.	Require respirator use when sampling "hot" wells.
Ambient air quality in all work areas.	Check all work areas with portable meter several times per day.
Variable results on time-integrated samples.	Analyze duplicate samples at two laboratories; evaluate QAQC in detail; execute response action plan.

6.3 Problems Resolved

None.

6.4 On-going Events/Activities

Measure ambient air quality in all work areas several times per day.

Conduct periodic time-integrated sampling in all major work areas.

Require respiratory protection when sampling "hot" wells.

Conduct necessary air sampling and analyses to issue and maintain "burn" permits.

Conduct the necessary air sampling to issue and maintain confined space entry permits.

Closely monitor ambient air quality in the vicinity of all dismantling work.

Conduct respirator fit tests on all employees.

Follow-up on AATS response action items.

7.0 QUALITY ASSURANCE/QUALITY CONTROL

7.1 Summary of Activities

Collected 3 time-integrated ambient air samples.

Collected 28 groundwater remedial progress samples and submitted for analyses with the required QAQC samples.

Field parameters on all samples met QAQC requirements.

The air sample results were validated with no unresolved issues.

The 1995 annual groundwater sampling analytical results were validated with no unresolved issues.

A report on the annual FLTG audit of AATS was issued; there were no major findings which required response action.

7.2 Problems and Response Action

None.

7.3 Problems Resolved

None.

7.4 Upcoming Events and Activities

Monthly ambient air samples to measure potential human exposure.

Quarterly aquifer remediation progress sampling.

QAQC validation of all air and groundwater samples.

Audit closure activities/progress versus plan every two weeks.

Issue 1995 Annual aquifer sampling report.

Issue First Quarter, 1996, Aquifer Progress Sampling Report.

8.0 SITE MAINTENANCE

8.1 Summary of Activities

The site safety and housekeeping inspections and responses kept grounds safe and attractive for employees and visitors.

All purchases were covered by written requisitions and purchase orders. Purchase of chemicals is now reduced to groundwater treatment and in-situ remediation.

Routine preventive and production maintenance was performed on all equipment.

The flood gate was exercised on December 5, 1995, with no leak detected.

All fire extinguishers were inspected and certified.

Smith Security provides security at the FLTG site, including the south side of Gulf Pump Road; all site areas are checked. No incidents reported by Security in January.

All training is documented and records are maintained on-site. Employee semi-annual physicals and screening have been completed.

Data base is fully operational. Data is entered on a daily basis.

Evaluated proposals to purchase water treatment plant.

On-site personnel requirements decreased as the dismantling proceeded.

Developed the final long-term site management plan.

Evaluated several long-term site management options for FLTG.

Decreased project control requirement by about 40%.

8.2 Problem Areas and Response Action

None.

8.3 Problems Resolved

None.

8.4 Upcoming Events and Activities

Control purchasing and contracting.

Process invoices and cash management.

Negotiate lump sum for agency oversight.

Evaluate long-term property access options.

Sell water treatment plant.

Sell surplus equipment.

9.0 WETLANDS MAINTENANCE

9.1 Summary of Activities and Progress

Inspected the site twice per week to evaluate status and to determine maintenance requirements.

Continued work on a video of the project.

Continued the 5-year maintenance program.

Took aerial photos of the site to evaluate vegetation status.

9.2 Problem Areas and Solutions

None.

9.3 Problems Resolved

None.

9.4 Deliverables Submitted

December, 1995, Monthly Report.

9.5 Upcoming Events and Activities

Daily safety program when work on site.

Support Baytown response plan for the remaining affected soil.

Regular site inspections.

Site maintenance as required.

Issue construction completion report.

Issue quarterly status report.

Complete project video.